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8 NOEL LEE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SANFRANCISCO DIVISION

13 NOEL LEE,

No. CV 08-1508 MMC

14 Plaintiff,

15 v.

16 BLUE RIVER ASSET MANAGEMENT,
17 LLC, BLUE RIVER ADVANTAGED MUNI
FUND II, LLC, and ROBERT BIGELOW, III,

**STIPULATION TO REQUEST
EXTENSION OF TIME FOR
DEFENDANTS' RESPONSE TO
COMPLAINT AND TO REQUEST
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

18 Defendants.

20 Plaintiff Noel Lee (“Lee”) and Defendants Blue River Asset Management,
21 LLC, Blue River Advantaged Muni Fund II, LLC (“Fund”), and Robert Bigelow, III
22 (“Bigelow”) (“Defendants”), have arrived at a resolution of this matter that will result in a
23 dismissal of the matter in its entirety on or before July 21, 2008. In the interim, there is a
24 June 27, 2008 Initial Case Management Conference in Courtroom 7 at 10:30 a.m.
25 Accordingly, and with apologies to the Court for the eleventh hour nature of this
26 stipulated request,

1 IT IS HEREBY STIPULATED by and between the parties to this action
 2 through their designated counsel that Defendants shall have an extension of time until
 3 July 21, 2008 to file a responsive pleading, if any, in this matter.

4 IT IS FURTHER STIPULATED by and between the parties to this action
 5 through their designated counsel and requested of the Court that the Initial Case
 6 Management Conference be reset to a date in August 2008 or such time as the Court may
 7 deem proper. The parties' Rule 26(f) Reports, initial disclosure and Case Management
 8 Statement will be due as set by Court Order to comport with the rescheduled Initial Case
 9 Management Conference. It is the expectation of the parties that this Conference will not
 10 occur based upon the above-referenced impending dismissal.

11 IT IS FURTHER STIPULATED, by and between the parties to this action
 12 through their designated counsel that this Stipulation may be executed in two counter
 13 parts, each of which shall be deemed a duplicate original, but all of which together shall
 14 constitute one and the same agreement, and facsimile signatures should be deemed
 15 original signatures.

16 Dated: June 17, 2008

CARROLL, BURDICK & McDONOUGH LLP

17 By _____
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 Matthew F. Miller
 Attorneys for Plaintiff NOEL LEE

Dated: June ___, 2008

 Mark A. Adams
 Attorney or Authorized Agent for Defendants
 BLUE RIVER ASSET MANAGEMENT, LLC, BLUE
 RIVER ADVANTAGE MUNI FUND II, LLC, and
 ROBERT BIGELOW, III

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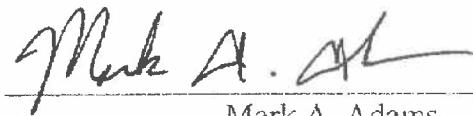
16 Dated: June 17, 2008

CARROLL, BURDICK & McDONOUGH LLP

17
18 By 
19 Matthew F. Miller
20
21
22

Attorneys for Plaintiff NOEL LEE

23 Dated: June 17, 2008



24 Mark A. Adams
25 Attorney or Authorized Agent for Defendants
26 BLUE RIVER ASSET MANAGEMENT, LLC, BLUE
27 RIVER ADVANTAGE MUNI FUND II, LLC, and
28 ROBERT BIGELOW, III

1 PURSUANT TO STIPULATION, IT IS SO ORDERED that the Initial Case
2 Management Conference shall occur at _____ a.m./p.m. on _____, 2008. The
3 parties shall file the Rule 26(f) report and complete initial disclosure and file Case
4 Management Conference Statements by _____, 2008.

5 Dated: June ___, 2008

6 _____
7 The Honorable Maxine M. Chesney
8 United States District Judge

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